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June 9, 2025

VIA ECF ONLY

Hon. Brian M. Cogan, U.S.D.J.
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Full Circle United, LLC v. Bay Tek Entm't, Inc., No. 1:20-cv-03395-BMC

Dear Judge Cogan:

We are counsel for Bay Tek Entertainment, Inc. ("Bay Tek") in the above matter. We write with the consent of counsel for Full Circle United, LLC.

As the Court is aware, Judge Henry held a pre-trial conference on Friday, May 30 and confirmed the trial date of June 16, 2025. Judge Henry also informed the parties that, *inter alia*, Your Honor has allotted June 16-18 and June 23-25 for the trial in the above matter, including jury deliberations, and that each trial day will be from 9:30 a.m. – 4:30 p.m. Judge Henry also indicated that the expectation would be for the jury's last day to be June 25th and that is what she intended to tell the venire.

Based on this, the parties respectfully request that the Court advise as to any rulings on the following matters to assist the parties in their trial preparation:

1. Time limitations for witness testimony and opening and closing statements.
2. Order of witnesses and order of proof. Specifically, whether the Court's practice is to allow a witness to be called to the stand more than once other than for rebuttal.
3. Procedures for any use of demonstratives and/or exhibits during opening and closing statements.
4. Timing for submission of jury instructions and any verdict forms.

We thank the Court for its consideration.



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Respectfully,

/s/ Mark C. Humphrey

Mark C. Humphrey
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